

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

**BRANDI LEIGH FORBES,**

*Plaintiff,*

**-vs-**

**INTREPID COLLEGE PREP,**

*Defendant.*

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**Case No. \_\_\_\_\_**

**JURY DEMAND**

**C O M P L A I N T**

COMES NOW THE PLAINTIFF, BRANDI LEIGH FORBES, and sues the Defendant, INTREPID COLLEGE PREP, and would state as follows:

**I.**

**Introduction**

1. Brandi L. Forbes brings this action against Intrepid College Prep, a public charter school provider located in Davidson County, Tennessee, for wrongfully terminating her employment as Assistant Principal of Culture. The Plaintiff alleges that her termination was based on her refusal to participate in an LGBTQ school-sponsored celebration because of her sincerely held religious beliefs and her traditional Judeo-Christian views as a Christian regarding human sexuality. Plaintiff seeks compensatory damages arising out of the Defendant's religious discrimination and retaliation in violation of Title VII of the Civil Rights Act of 1964, as amended.

## **II. Jurisdiction and Venue**

2. This court is vested with jurisdiction pursuant to 28 U.S.C. §1331 based on a federal question and claims based on Title VII of the Civil Rights Act of 1964. In addition, venue is proper because the parties are domiciled in this federal district, and all of the events giving rise to this case occurred within the Middle District of Tennessee.

## **III. Parties**

3. The Plaintiff Brandi L. Forbes is an adult citizen and resident of Rutherford County, Tennessee.

4. The Defendant Intrepid College Prep is a network of free, public charter schools located in the Antioch area of Greater Nashville. The Defendant operates two campuses: Opportunity Academy Middle School and Independence Academy High School. Its principal headquarters are located at 5221 Hickory Hollow Parkway, Antioch, Tennessee 37013. Its registered agent for service of process is Mary Cypress Metz, who may be served at 5221 Hickory Hollow Parkway, Antioch, TN 37013.

## **IV. Facts**

1. Brandi Forbes was hired by Intrepid College Prep in July of 2019 as a 7<sup>th</sup> Grade Humanities Teacher at Opportunity Academy Middle School. Her starting salary was \$45,900.00. She was later transferred to Independence Academy High School where she was employed during the relevant time period in this case.

2. Ms. Forbes was promoted to the position of Assistant Principal of Culture in September of 2023.

3. In May of 2023, the Principal of Independence Academy High School, Christina McDonald announced during a leadership team meeting that the Middle School, Opportunity Academy, was conducting a “pride week” celebration, and that she planned to have one at Independence Academy.

4. The so-called “pride week” celebration at Opportunity Academy consisted of banners and signs and other propaganda throughout the school and in classrooms that promoted same-sex relationships and gay and lesbian ideology and a “pan gender” guest speaker.

5. Ms. Forbes and Alliyah Kinnard, the Dean of Culture, both met with Principal McDonald following the meeting. During this meeting both told her that they felt uncomfortable planning or participating in such an event because of their personal religious beliefs.

6. Principal McDonald responded that the school had celebrated Black History month and Hispanic Heritage month and should also celebrate Pride month.

7. The Plaintiff and Ms. Kinnard explained to Ms. McDonald why the school’s celebration of an LGBTQ school-sponsored event raised religious concerns and was different from the school’s recognition of Black History or Hispanic Heritage.

8. In August of 2023, the Plaintiff met again with Principal McDonald and shared again her concerns about having to participate in any LGBTQ school event or celebration. Ms. McDonald provided Ms. Forbes with the name of a local Pastor, Danny Bryant, whom she knew and who supported the LGBTQ community to had helped her reconcile her own beliefs and attitude regarding LGBTQ issues and to adopt a “new way of thinking” about this issue. The Plaintiff agreed to meet with Pastor Bryant.

9. On August 28, 2023, Ms. Forbes met with Pastor Bryant and discussed with him her faith-based beliefs as a Christian as well as her conflict with the school's celebration of a pride week event. She also gave permission to Pastor Bryant to convey to Ms. McDonald her shared concerns. He advised Ms. Forbes that he would be telling Principal McDonald that when it comes to the LGBTQ community and planning of such events, she should exclude Ms. Forbes.

10. During the months of October and November of 2023, the school administration allowed students and teachers to display flags in several classrooms that were symbolic of the LGBTQ community.

11. In a leadership meeting in November of 2023, with the school administrative staff, Ms. Forbes voiced her concern that several no other views were being represented, especially given the diversity of religious views in the community. Ms. Forbes asked those in the meeting: "what if someone were to display a Jesus flag?" Anna Dufur, another Assistant Principal, then said that it would make her uncomfortable and that she would look at that person differently.

12. On November 10, 2023, Ms. McDonald randomly added a meeting invitation to Ms. Forbes' calendar. When Ms. Forbes met with her that afternoon, Ms. McDonald questioned her again regarding her religious opposition to the school's endorsement of LGBTQ issues. Ms. McDonald responded at one point during this conversation: "I want us to have a school community where once you walk through those doors religion doesn't matter and love is love and if you don't agree with that then you can't work here."

13. Later, on November 10, 2023, Ms. McDonald announced during a meeting attended by a teacher, Bradley Barker, Ms. Forbes and Assistant Principal Kevin Rose, that

she did not believe that she “could have an Assistant Principle of Culture who did not celebrate all identities in our community.”

14. On or about December 13, 2023, Ms. Forbes was advised by a fellow teacher, that Ms. McDonald had declared to her that “if you can’t hang a BLM and an LGBTQ flag in your classroom then you can’t work here.”

15. Two days later, on December 15, 2023, while Ms. Forbes was sitting in the teacher workroom, when she was joined by Arion Mills. Mr. Mills advised her that Ms. McDonald had asked him to speak with her. Mr. Mills confided to Ms. Forbes that Principal McDonald had accused Ms. Forbes of telling gay or lesbian individuals that they needed to change and what they were doing was not okay. Ms. Forbes advised Mr. Mills that this accusation was categorically false.

16. On January 10, 2024, Ms. Forbes was sent home early following a meeting with Principal McDonald, when she stated that she would be speaking with Amy Shelton in Human Resources regarding Ms. McDonald’s statement that she could not have an Assistant Principle of Culture who did not celebrate all sexual identities in the community.

17. Ms. Forbes did meet with Amy Shelton on January 11, 2024, informing her of Ms. McDonald’s stated requirement for all Assistant Principals.

18. On January 23, 2024, Ms. Forbes participated in a Zoom call with CEO Abigail Rockey and Amy Shelton. Plaintiff was informed that she was being terminated from her position, and that she would be “eligible to continue to receive full pay for the next 6 weeks. Your last day of pay will be considered March 8, 2024. .” Ms. Forbes was instructed to return her key fob and laptop by the end of the week of January 26, 2024.

19. At the time of her termination, the Plaintiff's annual salary was \$73,000.00, together with medical and other benefits.

20. On June 21, 2024, Plaintiff timely filed a charge of discrimination with the Equal Employment Opportunity Commission. (A true and correct copy of this EEOC Charge is attached hereto as **Exhibit A** and is incorporated herein by reference).

21. On July 1, 2024, the EEOC issued a Determination and Notice of Right to Sue Letter to the Plaintiff. A true and correct copy of this document is attached hereto as **Exhibit B** and is incorporated herein by reference).

**V.  
Causes of Action  
COUNT I  
Wrongful Termination Under Title VII Based on Religious Discrimination**

22. Plaintiff incorporates the allegations in the previous paragraphs, and does further allege as follows.

23. The Plaintiff holds certain sincere religious beliefs that conflicted with a requirement of her employment.

24. The Plaintiff informed her employer of the conflict.

25. The Plaintiff was discharged for failing to adhere to the conflicting employment requirement.

26. The Defendant's termination of the Plaintiff was motivated out of discriminatory animus based on the Plaintiff's sincerely-held religious beliefs.

27. As a consequence of the Defendant's discriminatory practices, the Plaintiff has suffered economic damages as well as mental anguish, humiliation and embarrassment for which she is entitled to an award of compensatory damages.

**COUNT II**  
**Retaliation Based on the Exercise of Religious Beliefs**

28. Plaintiff incorporates the allegations in the previous paragraphs, and does further allege as follows.

29. The Defendant's actions as alleged herein constitute retaliation toward the Plaintiff, and were motivated by discriminatory animus toward the Plaintiff based on her traditional Judeo-Christian and biblical views regarding human sexuality and her sincerely-held religious beliefs.

30. As a consequence of the Defendant's retaliatory actions, the Plaintiff has suffered economic damages as well as mental anguish, humiliation and embarrassment for which she is entitled to an award of compensatory damages.

PREMISES CONSIDERED, PLAINTIFF REQUESTS THE FOLLOWING RELIEF:

***Nominal Damages***

1. Plaintiff seeks an order awarding nominal damages for the Defendants' violation of her statutory rights under Title VII of the Civil Rights Act.

***Compensatory Damages***

2. Plaintiff seeks an order awarding compensatory damages against the Defendant for her violation of the Plaintiff's rights under Title VII in the amount of \$500,000.00.

***Attorney's Fees and Costs***

3. Plaintiff seeks an order awarding the costs of this cause, including attorney's fees, costs and expenses as provided by statute.

***Jury Demand***

4. Plaintiff demands a jury of six to hear and try this case.

***Other Relief***

5. Plaintiff additionally requests such other relief as the Court deems just and proper.

Respectfully submitted,

**CRAIN LAW GROUP, PLLC**

By:

*/s/ Larry L. Crain*

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